

Saunders Brothers – Locke Mills Plant)	Departmental
Oxford County)	Findings of Fact and Order
Greenwood, Maine)	Air Emission License
A-15-71-G-A)	Amendment #1

After review of the air emissions license amendment application, staff investigation reports and other documents in the applicant’s file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., Section 344 and Section 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

1. Gilbert Wood Products, of Greenwood, Maine was issued Air Emission License A-15-71-D-A/R on October 30, 2001, permitting the operation of emission sources associated with their wood turning facility.
2. Saunders Brothers, Inc., the parent company of Gilbert Wood Products, Inc., has requested an amendment to their air emission license to increase the total annual VOC emissions restriction.
3. Saunders Brothers has also requested to amend their air emission license change to reflect a company name change from Gilbert Wood Products, Inc. to Saunders Brothers – Locke Mills Plant.
4. Saunders Brothers has also requested that this amendment reflect the permanent disablement of the previously licensed Kilns #1 and #2.
5. Saunders Brothers has also requested that this amendment include the operation of the Ozmoose Dryer formally utilized at their Westbrook, Maine site.

B. Application Classification

Saunders Brothers is applying to have their Greenwood facility’s Air Emission License amended to reflect an increase in VOC emissions from an increase in production due to closures of other plants operating under Saunders Brothers and to change the name of the facility from Gilbert Wood Products, Inc. to Saunders Brothers – Locke Mills Plant. The amendment will not result in a significant emissions increase of regulated pollutants. Therefore, this application is considered a minor modification and has been processed as such.

II. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

In order to receive a license the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in Chapter 100 of the Department regulations. Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for existing emissions equipment means that method which controls or reduces emissions to the lowest possible level considering:

- the existing state of technology;
- the effectiveness of available alternatives for reducing emission from the source being considered; and
- the economic feasibility for the type of establishment involved.

BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in Chapter 100 of the Air Regulations. BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

B. Name Change

The Gilbert Wood Products, Inc. mill is owned by Saunders Brothers, Inc. and was formally licensed under the name Gilbert Wood Products, Inc. Saunders Brothers, Inc. has changed the name of the facility to Saunders Brothers – Locke Mills Plant and have requested that this and future air emission license materials reflect this name change. Saunders Brothers – Locke Mills Plant is a manufacturer of wood products, primarily dowels, pins and turnings.

C. VOC Restriction Increase

Saunders Brothers – Locke Mills Plant has requested an amendment to their current air emission license (A-15-71-D-A/R) to increase their annual VOC emission restriction from 20.6 tons per year (tons/yr) of VOC emissions to 39.9 tons/yr of VOC emissions. The increase in the annual VOC restriction is due to an expansion in volume as a result of closures of other plants owned by Saunders Brothers and equipment and work from those plants being moved to the Lock Mills Plant. The majority of VOC emissions increase will be the result of an increase in painting and coating operations. Saunders Brothers does not anticipate any increase in the fuel consumption needs as a result of the increase in volume at the Locke Mills Plant.

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Saunders Brothers, Inc. plans to relocate coating equipment from their Westbrook, Maine facility (air emission license A-159-71-G-R), to the Saunders Brothers – Locke Mills Plant. The coating equipment being relocated includes enclosed metal tumblers, a spray booth and a dip type coating process in which the wood products are submerged into the coating and removed slowly, followed by air drying. The fumes from these processes are vented to atmosphere.

Pollutants associated with the operation of finishing equipment are (PM), (PM₁₀), volatile organic compounds (VOC) and Hazardous Air Pollutants (HAPs). BACT for VOCs from coating processes shall include good house keeping practices to minimize fugitive VOC emissions. Good housekeeping practices include covering coating storage containers and dip coating tank when these containers are not in use, cleaning excess and/or spilt material and proper disposal of contaminated working equipment (gloves, coveralls, tools etc). BACT shall also include monthly and twelve-month rolling total record keeping as outlined in Section (E) of the Finding of Facts of this license.

Saunders Brothers – Locke Mills Plant, as a wood manufacturing facility that performs surface coating could be subject to Chapter 129 of the Department’s regulations. Saunders Brothers – Locke Mills Plant has accepted federally enforceable restrictions on HAPs emissions of 9.9 tons/yr of any single HAP and 24.9 tons/yr of all combined HAPs. Saunders Brothers – Locke Mills Plant is not considered a Major Source as defined in 40 CFR Part 63, subpart A, 63.2, and therefore is not subject to Chapter 129 of the Department’s regulations. Compliance will be based on monthly and twelve-month rolling total record keeping indicating the amount of product used and percent HAP by weight in each product.

BACT for the control of particulate matter shall be filters on the spray booth.

BACT shall be no visible emissions from the finishing department vents.

D. Wood Drying Kilns

Saunders Brothers – Locke Mills Plant has permanently disabled Kilns #1 and #2 and have no plans of reactivating the kilns. Saunders Brothers – Locke Mills Plant plans to continue operation of Kiln #3. Saunders Brothers – Locke Mills Plant dries soft maple, beech, yellow birch and hard maple, all of which are hardwood species. BACT shall include monthly and twelve-month rolling total record keeping as outlined in Section (E) of the Finding of Facts of this license. Due to the lack of existing data for emissions from hardwood species, in calculating VOC emissions for VOC record keeping requirements, Saunders Brothers – Locke Mills Plant will use a VOC emission factor based on the lowest softwood factor of 0.12 pounds of VOC per 1000 board feet (lb/1000BF) for cedar.

E. Ozmose Dryer

Saunders Brothers plans to include the operation of an Ozmose Dryer to their Saunders Brothers – Locke Mills Plant equipment list. The Ozmose Dryer is being relocated to the facility from Saunders Brother’s Westbrook, Maine site. The dryer is utilized to tumble dry pressure treated dowels. The dowels are treated with chromated copper arsenate at Maine Wood Treaters and then brought to the Saunders Brothers – Locke Mills Plant to be dried in the Ozmose Dryer. The drying of wood treated with chromated copper arsenate results in very small emissions of chromium and copper compounds. Based on the amount of treated wood to be dried at the Saunders Brothers – Locke Mills Plant and the very small resultant emissions form the treated wood drying process, the Department has concluded that the Ozmose dryer is an insignificant source of emissions.

F. VOC and HAP Emissions Records

VOC emissions from the use of coatings and from the kiln drying of wood shall be documented by monthly and twelve-month rolling total record keeping. The VOC record shall include the amount of coating used on site, material safety data sheets (MSDS) for each type of coating used indicating the VOC content of the coatings, the amount of wood dried in the kilns and the total facility VOC emissions (including calculations). In calculating VOC emissions from coatings, it is assumed that all volatile components of the coatings are released to the atmosphere. The total facility VOC emissions shall not exceed 39.9 tons per year based on a 12 month rolling total.

HAP emissions shall be documented by monthly and twelve-month rolling total record keeping including the amount of coatings used, the percent HAP content of each product and the total facility HAP emissions. Total facility HAP emissions shall be limited to 9.9 tons per year of any single HAP and 24.9 tons per year of all combined HAPs.

G. Annual Emission Restrictions

Saunders Brothers has the following annual VOC and HAP emissions restrictions, based on a 12-month rolling total:

Pollutant	Tons/Year
VOC	39.9
HAPs*	24.9
Individual HAPs*	9.9

* HAPs are identified by the EPA in regulations pursuant to Section 112(b) of the Clean Air Act (CAA).

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III. AMBIENT AIR QUALITY ANALYSIS

According to the Maine Regulations Chapter 115, the level of air quality analyses required for a minor source shall be determined on a case-by case basis. Based on the information available in the file, and the similarity to existing sources, Maine Ambient Air Quality Standards (MAAQS) will not be violated by this source. Based on the total facility emissions, Saunders Brothers – Locke Mills Plant is below the emissions level required for modeling and monitoring.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards,
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License A-15-71-G-A subject to the conditions found in Air Emission License A-15-71-D-A/R and the following conditions:

The following shall replace Conditions (18) and (19) of Air Emission License A-15-71-D-A/R:

(18) Drying Kilns

- A. Saunders Brothers – Locke Mills Plant shall no longer make use of Kilns #1 and #2.
- B. Saunders Brothers – Locke Mills Plant shall maintain a record of kiln production from Kiln #3, which shall include the amount of wood dried and the species of wood dried. The kiln production record shall be maintained on a monthly and twelve-month rolling total basis and included in the facility's VOC emission record as required by Condition (23) of this license.

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The following shall replace Condition (23) of Air Emission License A-15-71-D-A/R:

(23) VOC and HAP Record Keeping

- A. Saunders Brothers – Locke Mills Plant shall maintain a record of VOC emissions from the use of coatings and from the kiln drying of wood. The VOC record shall include the amount of coating used on site, material safety data sheets (MSDS) for each type of coating used indicating the VOC content of the coatings, the amount of wood dried in the kilns and the total facility VOC emissions (including calculations). The VOC emissions record shall be maintained on a monthly and twelve-month rolling total basis.
- B. Saunders Brothers – Locke Mills Plant shall maintain a record of HAP emissions from the use of coatings. The HAP record shall include the amount of coatings used, the percent HAP content of each product and the total facility HAP emissions. The HAP record shall be maintained on a monthly and twelve-month rolling total basis.

The following are new conditions to Air Emission License A-15-71-D-A/R:

(25) Coating Equipment

- A. Saunders Brothers – Locke Mills Plant shall maintain good housekeeping practices to minimize fugitive VOC and HAP emissions from the coating department. Good housekeeping practices shall include covering coating storage containers and dip finish tank when these containers are not in use, cleaning excess and/or spilt material and proper disposal of contaminated working equipment (gloves, coveralls, tools etc).
- B. Saunders Brothers – Locke Mills Plant shall maintain their spray paint booth, including spray booth blower and filters, in good working order and any coating material spilt or excess coating material shall be cleaned up immediately. A record shall be kept in regards to spray booth maintenance, failures and corrective action.
- C. Saunders Brothers – Locke Mills Plant shall maintain their enclosed metal tumbler and dip tank equipment in good working order and any coating material spilled or excess coating material shall be cleaned up immediately. A record shall be kept in regards to enclosed metal tumbler and dip tank equipment maintenance, failures and corrective action.
- D. Visible emissions from the coating department vents shall be 0% opacity.

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- (26) Saunders Brothers shall notify the Department within 48 hours and submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component causes a violation of any emission standard (Title 38 MRSA §605-C).
- (27) Saunders Brothers shall pay the annual air emission license fee within 30 days of October 31 of each year. Pursuant to 38 MRSA 353-A, failure to pay this annual fee in the stated timeframe is sufficient grounds for the revocation of the license under 38 MRSA 341-D, Subsection 3.
- (28) Annual Emission Statement

In accordance with MEDEP Chapter 137, the licensee shall annually report to the Department by September 1, the information necessary to accurately update the State's emission inventory by means of:

- 1) A computer program and accompanying instructions supplied by the Department;
- Or
- 2) A written emission statement containing the information required in MEDEP Chapter 137.

Reports and questions should be directed to:

Attn: Criteria Emission Inventory Coordinator
Maine DEP
Bureau of Air Quality
17 State House Station
Augusta, ME 04333-0017

Phone: (207) 287-2437

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(29) This amendment shall expire concurrently with Air Emission License A-15-71-D-A/R.

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2004.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
DAWN R. GALLAGHER, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: **July 30, 2003**

Date of application acceptance: **July 30, 2003**

Date filed with the Board of Environmental Protection: _____

This Order prepared by, Peter G. Carleton, Bureau of Air Quality